

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA**

**IN RE:**

**Travinia Italian Kitchen at Richmond, LLC,**

**Debtor.**

**Case # 19-01325-hb**

**Chapter 7**

**RESPONSE TO APPLICATION FOR SALE OF PROPERTY  
FREE AND CLEAR OF LIENS**

West Town Bank & Trust, a secured creditor herein, hereby responds to the Notice and Application for Sale of Property Free and Clear of Liens, filed at Docket No. 5, as follows:

West Town Bank & Trust f/k/a West Town Savings Bank (“West Town”) is a secured creditor by virtue of a properly perfected security agreement attaching to all assets of the Debtor. The amount of the debt owed to West Town far exceeds the proposed purchase price of the assets. As acknowledged by the Trustee, West Town’s consent to the sale is required, pursuant to 11 U.S.C. § 363(f).

This bankruptcy case was recently filed on March 6, 2019, and West Town has not yet had an opportunity to investigate the fair market value of the assets to determine if the proposed sale price is fair and reasonable. West Town is in the process of obtaining information from the Debtor which will enable it to do so. West Town reserves its rights with regard to the proposed sale, including but not limited to its right to consent or object.

RESPECTFULLY SUBMITTED on this the 26<sup>th</sup> day of March, 2019, at Murrells Inlet, South Carolina.

BARTON BRIMM, PA

BY: /s/Christine E. Brimm, #6313

Christine E. Brimm  
3955 Hwy 17 Bypass, Suite D  
Post Office Box 2746

Murrells Inlet, South Carolina 29576  
(803) 256-6582  
Counsel for West Town Bank & Trust

UNITESTATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA

IN RE:

Travinia Italian Kitchen at Richmond, LLC,  
Debtor.

Case # 19-01325-hb  
Chapter 7

**CERTIFICATE OF SERVICE**

I, Connie Fraser, hereby certify that I, on behalf of Christine E. Brimm, District Court I.D. #6313, Counsel for West Town Bank & Trust, served a copy of the **Response to Application for Sale of Property Free and Clear of Liens, filed March 26, 2019**, on the Office of the United States Trustee via electronic filing and electronic transmission through CM/ECF, pursuant to SC LBR 9036-1, and on the parties in interest as shown below, via CM/ECF and/or U.S. Mail, as indicated, on March 26, 2019.

John K. Fort, Trustee  
P.O. Box 789  
Drayton, SC 29333  
*Via CM/ECF and U.S. Mail*

BARTON BRIMM, PA

BY: /s/ Connie Fraser  
Post Office Box 2746  
Murrells Inlet, South Carolina 29576  
TEL: 803.256.6582  
FAX: 803.779.0267